

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Charles H Prem	:	Case No. 24-13445 AMC
	:	
Debtor	:	
	:	Chapter 13
_____	:	
NewRez LLC dba Shellpoint Mortgage Servicing	:	
	:	
Movant,	:	
	:	
vs.	:	
	:	
Charles H Prem	:	
	:	
Debtor	:	
	:	
Scott F. Waterman, Ch 13 Standing Trustee	:	
Respondents	:	
_____	:	

NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE

NewRez LLC dba Shellpoint Mortgage Servicing has filed a Motion for Relief from Stay pursuant to 11 U.S.C. § 362(d) with this Court.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before **February 3, 2025** you or your attorney must do **all** of the following:

- (a) file an answer explaining your position at:
U.S. Bankruptcy Court
Eastern District of PA
Bankruptcy Clerk of Courts
900 Market Street, Suite 204
Philadelphia, PA 19107

If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's Attorney:

Michael Clark, Esquire
Pincus Law Group, PLLC
Five Greentree Centre
525 Route 73 North, Suite 309
Marlton, NJ 08053
516-699-8902 PHONE
516-279-6990 FAX

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on **February 12, 2025 at 11:00 am** Courtroom 4 United States Bankruptcy Court, Eastern District of Pennsylvania. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2821 to find out whether the hearing has been canceled because no one filed an answer.

Respectfully submitted,

PINCUS LAW GROUP, PLLC

Dated: January 13, 2025

By: /s/ Michael Clark
Michael Clark, Esquire
Five Greentree Centre
525 Route 73 North, Suite 309
Marlton, NJ 08053
Telephone: 516-699-8902
Email: mclark@pincuslaw.com